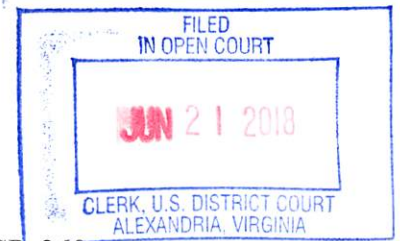


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 1:18-CR-260
	)	
FRANCISCO STANACHE,	)	<u>Count 1</u> : 18 U.S.C. § 1349
Counts 1-5, 9-10 and 23-24	)	(Conspiracy to Commit Wire Fraud)
	)	
MARIA TANASACHE,	)	<u>Counts 2-30</u> : 18 U.S.C. §§ 1343, 2
Counts 1-5, 17, 19-22 and 24	)	(Wire Fraud and Aiding and Abetting)
	)	
MARIA BUSTEAN,	)	Forfeiture Notice
Counts 1 and 15-19	)	
	)	
CRISTIAN STANACHE,	)	
Counts 1, 6-8, 11-14, 27, 28	)	
and 30	)	
	)	
MADALINA PURCARIN,	)	
a/k/a Madalina Pucarin	)	
Counts 1, 8, 12, 14, 25-26, and	)	
28-30	)	
	)	
Defendants.	)	

INDICTMENT

June 2018 TERM – at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. The Target Corporation (“Target”) was a corporation based in Minneapolis, Minnesota that operated approximately 1,800 discount retail chain stores throughout the United States, including in the Eastern District of Virginia.

2. Target used computer databases linked over interstate wires to process purchases and returns at its various retail locations. Whenever a purchase was made at a Target retail location, computers at the Target retail location communicated electronically with the retail location's point-of-sale system. The retail location's point-of-sale-system collected sales data and periodically transmitted the information to Target's headquarters database located in Brooklyn Park, Minnesota.

3. When a purchase was made at a Target retail location, Target's computer systems generated a sales receipt. The receipt included a description of the items purchased, the price of the items purchased, the method of payment, information about the applicable state and local taxes and other identifying information. Each receipt had a unique numeric identifier that was generated by the computer system.

4. When an individual returned merchandise using a Target sales receipt at a Target retail location where the purchase was made on the same day, Target employees, using computer equipment, generated interstate signals communications which were transmitted from the Target retail location to Target's corporate servers located in Brooklyn Park, Minnesota. Target's corporate servers would authenticate the receipt and, via a return interstate wire communication, advise the local Target retail location whether the attempted return exceeded the value of the original receipt. In instances where a Target customer disputed the accuracy of information contained in Target's databases with respect to an attempted return transaction, Target allowed certain employees to make on-site determinations to resolve the situation. Subsequent attempted returns resulted in the generation of additional instances of interstate signals communications between the retail location of the attempted return and Target's corporate servers in Brooklyn Park, Minnesota.

Count 1

(Conspiracy to Commit Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

5. The allegations set forth in paragraphs 1 through 4 of this Indictment are realleged and incorporated as if set forth herein.

6. Beginning not later than December 2017 and continuing through in or around May 2018, in the Eastern District of Virginia and elsewhere, the defendants, FRANCISCO STANACHE, MARIA TANASACHE, MARIA BUSTEAN, CRISTIAN STANACHE, MADALINA PURCARIN (also known as Madalina Pucarin), and others known and unknown to the grand jury, knowingly and intentionally combined, conspired, confederated and agreed to commit wire fraud: that is, having devised and intending to devise a scheme and artifice to defraud Target and to obtain money and property from Target by means of materially false and fraudulent pretenses, representations and promises, to transmit and to cause to be transmitted by means of wire communication in interstate commerce, certain writings, signs and signals for the purpose of executing the scheme and artifice, in violation of Title 18, United States Code, Section 1343.

The Object of the Conspiracy

7. The object of the conspiracy was to obtain cash from Target by exploiting a vulnerability in Target's computer system that allowed a single sales receipt to be used multiple times at different retail locations for the purpose of returning substitute merchandise that was not sourced from Target and that was typically valued at a lesser amount than the originally purchased merchandise.

Manner and Means of the Conspiracy

The manner and means by which the defendants conducted the conspiracy included, but were not limited to the following:

8. Defendants and others would purchase merchandise, and at times a product warranty, from a Target retail location within the Eastern District of Virginia with cash for the purpose of generating a sales receipt to be used in successive attempts to obtain multiple cash refunds.

9. Defendants and others would immediately take the purchased merchandise and the sales receipt to the customer service desk at the same Target retail location and return the merchandise for a cash refund.

10. Defendants and others would cause Target employees to generate signals communications that were transmitted in interstate commerce from the Eastern District of Virginia, and elsewhere, to Target's corporate servers in Brooklyn Park, Minnesota, for the purpose of processing the return of the recently purchased merchandise.

11. Defendants and others would obtain a cash refund in exchange for their initial return and maintain possession of the sales receipt after obtaining the cash refund.

12. Defendants and others would then, on the same day as the initial purchase, travel to other Target retail locations within the Eastern District of Virginia, and elsewhere, for the purpose of attempting to return substitute merchandise that was not sourced from Target, along with the original receipt, in order to obtain additional cash refunds.

13. Defendants and others would cause Target employees at these subsequent store locations to generate signals communications that were transmitted in interstate commerce from the Eastern District of Virginia, and elsewhere, to Target's corporate servers in Brooklyn Park,

Minnesota, for the purpose of authenticating the sales receipt that was generated at the time of the initial purchase, so that the refund could be authorized.

14. Defendants and others would attempt to obtain, and would obtain, cash from Target by falsely presenting and representing the merchandise not sourced from Target as the merchandise that was associated with the original sales receipt at the subsequent Target stores later on the same day.

15. Defendants and others knowingly exploited a vulnerability in Target's centralized computer network. Members of the conspiracy understood that this vulnerability gave them a limited period to attempt, with a likelihood of success, multiple returns against a single receipt from the original purchase.

16. Defendants FRANCISCO STANACHE, MARIA TANASACHE, MARIA BUSTEAN, CRISTIAN STANACHE, MADALINA PURCARIN, are foreign nationals who reside and travel together and assist each other in executing the scheme and artifice to defraud.

#### Overt Acts

17. In furtherance of the conspiracy, the defendants committed the following acts, among others, in the Eastern District of Virginia and elsewhere:

##### *Fraud Scheme in California on November 8, 2017*

a. On or about November 8, 2017, FRANCISCO STANACHE purchased a Medela Breast Pump from a Target retailer in Fullerton, California (Store No. 1418), for \$409.44 in cash, and was issued a sales receipt (Receipt 2-7312-1418-0112-2925-4). Shortly thereafter, FRANCISCO STANACHE returned the product at the same store and received \$409.44 in cash.

b. Later that day, FRANCISCO STANACHE took the original sales receipt that was issued by the Fullerton, California store and another breast pump not sourced from Target to another Target store located in Whittier, California (Store No. 2019), where he successfully returned the substitute breast pump and received \$409.44 in cash.

c. That same day, MARIA TANASACHE took the original sales receipt that was issued by the Fullerton, California store and another breast pump not sourced from Target to another Target store located in Santa Ana, California (Store No. 250), where she successfully returned the substitute breast pump and received \$409.44 in cash.

*Fraud Scheme in Virginia on December 19, 2017*

d. On or about December 19, 2017, FRANCISCO STANACHE and MARIA TANASACHE purchased a Medela Breast Pump from a Target retailer located in Falls Church, Virginia (Store No. 1431), paying \$460.03 in cash for the product and an associated warranty, and were issued a sales receipt (Receipt 2-7353-1431-0082-9885-5). Shortly thereafter, FRANCISCO STANAHCE and MARIA TANASACHE returned the product at the same store and received \$460.03 in cash.

e. Later that day, MARIA TANASACHE took the original sales receipt issued by the Falls Church, Virginia store and another breast pump not sourced from Target to another Target store located in Alexandria, Virginia (Store No. 1076). MARIA TANASACHE successfully returned the substitute breast pump and received \$460.03 in cash.

f. That same day, MARIA TANASACHE attempted to make another return of another breast pump not sourced from Target at a Target store in District Heights, Maryland (Store No. 1897) using the sales receipt issued during the original purchase at Falls Church, Virginia. The return was declined.

g. That same day, MARIA TANASACHE took the sales receipt that was issued by the Falls Church, Virginia store and other breast pumps not sourced from Target to Target stores located in Upper Marlboro, Maryland (Store No. 1006), and in Hyattsville, Maryland (Store No. 1890), and successfully returned them, receiving approximately \$870 in cash.

*Fraud Scheme in Virginia on December 26, 2017*

h. On or about December 26, 2017, CRISTIAN STANACHE purchased over-the-counter medications from a Target retailer located in Alexandria, Virginia (Store No. 1533), paying \$198.26 in cash, and was issued a sales receipt (Receipt 2-7360-1533-0076-5839-6). Shortly thereafter, CRISTIAN STANACHE returned the products at the same Target store and received \$198.26 in cash.

i. Later that day, CRISTIAN STANACHE took the original sales receipt that was issued by the Alexandria, Virginia store and over-the-counter medications not sourced from Target to another Target store located in Fairfax, Virginia (Store No. 2790). There, CRISTIAN STANACHE successfully returned the products using the sales receipt issued by the Alexandria, Virginia store and received \$185.45 in cash.

j. Later that day, MADALINA PURCARIN took the original sales receipt that was issued by the Alexandria, Virginia store and over the counter medications not sourced from Target to another Target store located in Falls Church, Virginia (Store No. 1431). There, MADALINA PURCARIN successfully returned the over-the-counter medications and received \$111.27 in cash.

*Fraud Scheme in Virginia on December 28, 2017*

k. On or about December 28, 2017, a member of the conspiracy purchased over-the-counter medications from a Target retailer in Fairfax, Virginia (Store No. 1005), paying

\$122.98 in cash, and was issued a sales receipt (Receipt 2-7362-1005-0081-5330-1). Shortly thereafter, CRISTIAN STANACHE returned the products and received \$122.98 in cash.

l. Later that day, MADALINA PURCARIN took the original sales receipt that was issued by the Fairfax, Virginia store and over-the-counter medications not sourced from Target to a Target store located in Fairfax, Virginia (Store No. 2790), where she returned the over-the-counter medications and received \$104.97 in cash.

m. Later that day, CRISTIAN STANACHE took the original sales receipt that was issued by the Fairfax, Virginia store and over-the-counter medications not sourced from Target to a Target store located in Falls Church, Virginia (Store No. 1431), where he successfully returned the medication and received \$111.27 in cash.

n. Later that day, MADALINA PURCARIN took the original sales receipt that was issued by the Fairfax, Virginia store and over the counter medications not sourced from Target to a Target store located in Falls Church, Virginia (Store No. 1893), where she successfully returned the substitute products using the sales receipt issued by the Fairfax, Virginia store and received \$111.27 in cash.

*Fraud Scheme in Virginia on January 15, 2018*

o. On or about January 15, 2018, MARIA BUSTEAN purchased a Medela Breast Pump from a Target retailer in Falls Church, Virginia (Store No. 1893), paying \$460.03 in cash, and was issued a sales receipt (Receipt 2-8015-1893-0114-5332-0). Immediately after completing the purchase, MARIA BUSTEAN took the Medela Breast Pump and the sales receipt to Target's customer service desk, successfully returned it and received \$460.03 in cash.



p. Later that day, unindicted co-conspirator 1 (“UCC-1”) attempted to make an additional return using another breast pump and the original sales receipt that was issued by the Falls Church, Virginia store at a different Target store located in Sterling, Virginia (Store No. 2272). The return was declined.

q. Later that day, MARIA BUSTEAN and UCC-1 took the original sales receipt that was issued by the Falls Church, Virginia store and another breast pump to another Target store located in Chantilly, Virginia (Store No. 1827), and successfully returned the breast pump using the sales receipt issued by the Falls Church, Virginia store, and were given \$410.21 in cash.

r. Later that day, MARIA TANASACHE attempted to make an additional return using another breast pump and the original sales receipt that was issued by the Falls Church, Virginia store at a different Target store located in Gainesville, Virginia (Store No. 1873). The return was declined.

s. Later that day, MARIA TANASACHE took the original sales receipt issued by the Falls Church, Virginia store and another breast pump to another Target store located in Manassas, Virginia (Store No. 2323), where she successfully returned the breast pump and was given \$410.21 in cash.

*Fraud Scheme in Virginia on February 23, 2018*

t. On or about February 23, 2018, MARIA BUSTEAN purchased a Medela Breast Pump from a Target retailer located in Falls Church, Virginia (Store No. 1893), for \$460.03 in cash for the product and associated warranty, and was issued a sales receipt by the Target cashier (Receipt 2-8054-1893-0112-1451-3). Shortly thereafter, MARIA BUSTEAN returned the product at the same Target store and received \$460.03 in cash.

u. That same day, MARIA TANASACHE attempted to make additional returns using another breast pump and the original sales receipt that was issued by the Falls Church, Virginia store at two Target stores located in Alexandria, Virginia (Store Nos. 1533 and 1076). The returns were declined.

v. That same day, MARIA TANASACHE took the original sales receipt that was issued by the Falls Church, Virginia store and another breast pump to another Target store located in Falls Church, Virginia (Store No. 1431). MARIA TANASACHE successfully returned the breast pump and received \$460.03 in cash.

*Fraud Scheme in Virginia on March 16, 2018*

w. On or about March 16, 2018, MADALINA PURCARIN purchased a kitchen mixer from a Target retailer located in Falls Church, Virginia (Store No. 1431), for \$370.99 cash, and was issued a sales receipt by the Target cashier (Receipt 2-8075-1431-0175-1665-9). Immediately after completing the purchase, MADALINA PURCARIN took the kitchen mixer and the sales receipt to Target's customer service desk, returned the mixer, received \$370.99 in cash, and maintained possession of the original sales receipt.

x. That same day, MADALINA PURCARIN took the original sales receipt issued by the Falls Church, Virginia store and another kitchen mixer to another Target store located in Gainesville, Virginia (Store No. 1873). MADALINA PURCARIN successfully returned the kitchen mixer and was given \$370.99 in cash.

y. That same day, MADALINA PURCARIN took the original sales receipt that was issued by the Falls Church, Virginia store and another kitchen mixer to two additional Target stores located in Winchester, Virginia (Store Nos. 1234 and 2379), where she successfully returned the products and received approximately \$740.00 in cash.

18. Altogether, in Virginia, West Virginia, Maryland, Washington, D.C., Delaware, Pennsylvania, New Jersey, New York, California, Tennessee, North Carolina, South Carolina, Georgia, Florida, Iowa, Kansas, Missouri, Oklahoma, Nebraska, Arizona, Colorado, Indiana, and elsewhere, from no later than in or about November 2017 and continuing to in or about May 2018, the defendants and others known and unknown to the grand jury, acting in concert conducted over approximately 1,000 transactions in furtherance of the scheme to defraud, causing approximately \$120,000 in losses to Target.

(All in violation of Title 18, United States Code, Section 1349.)

Counts 2 - 30

(Wire Fraud and Aiding and Abetting)

THE GRAND JURY FURTHER CHARGES THAT:

19. The allegations set forth in paragraphs 1 through 4 and 8 through 16, subparagraphs a-y of paragraph 17, and paragraph 18 of this Indictment are realleged and incorporated as if set forth herein.

20. Beginning not later than in or about December 2017 and continuing through in or around May 2018, in the Eastern District of Virginia and elsewhere, Defendants FRANCISCO STANACHE, MARIA TANASACHE, MARIA BUSTEAN, CRISTIAN STANACHE, and MADALINA PURCARIN, devised a scheme and artifice to defraud Target, and to obtain money and property from the Target by means of materially false and fraudulent pretenses, representations, and promises. That is, the defendants and others operated a scheme to obtain multiple cash refunds from Target on the same day against one sales receipt, by returning substitute products to successive Target store locations, falsely representing them to be the original products purchased.

21. On the dates set forth in the table below, within the Eastern District of Virginia and elsewhere, and for the purpose of executing such scheme and artifice to defraud, the defendants indicated in the table below did knowingly transmit and cause to be transmitted writings, signs, signals, and sounds by means of wire communications in interstate and foreign commerce:

CT	DATE	DESCRIPTION	DEFENDANT(S)
2	12/19/2017	Wire from the Target store in in Falls Church, Virginia (Store No. 1431), to Target's corporate servers located in Brooklyn Park, Minnesota.	FRANCISCO STANACHE MARIA TANASACHE
3	12/19/2017	Wire from the Target store in Alexandria, Virginia (Store No.	MARIA TANASACHE FRANCISCO STANACHE

CT	DATE	DESCRIPTION	DEFENDANT(S)
		1076), to Target's corporate servers located in Brooklyn Park, Minnesota.	
4	12/20/2017	Wire from the Target store in Fairfax, Virginia (Store No. 1341), to Target's corporate servers located in Brooklyn Park, Minnesota.	FRANCISCO STANACHE MARIA TANASACHE
5	12/20/2017	Wire from the Target store in Leesburg, Virginia (Store No. 1874), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA TANASACHE FRANCISCO STANACHE
6	12/26/2017	Wire from the Target store in Alexandria, Virginia (Store No. 1533), to Target's corporate servers in Brooklyn Park, Minnesota.	CRISTIAN STANACHE
7	12/26/2017	Wire from the Target store in Fairfax, Virginia (Store No. 2790), to Target's corporate servers located in Brooklyn Park, Minnesota.	CRISTIAN STANACHE
8	12/26/2017	Wire from the Target store in Falls Church, Virginia (Store No. 1431), to Target's corporate servers located in Brooklyn Park, Minnesota.	MADALINA PURCARIN CRISTIAN STANACHE
9	12/27/2017	Wire from the Target store in Dumfries, Virginia (Store No. 2017), to Target's corporate servers located in Brooklyn Park, Minnesota.	FRANCISCO STANACHE
10	12/27/2017	Wire from the Target store in Manassas, Virginia (Store No. 2323), to Target's corporate servers located in Brooklyn Park, Minnesota.	FRANCISCO STANACHE
11	12/28/2017	Wire from the Target store in Fairfax, Virginia (Store No. 1005), to Target's corporate servers located in Brooklyn Park, Minnesota.	CRISTIAN STANACHE
12	12/28/2017	Wire from the Target store in Fairfax, Virginia (Store No. 2790), to Target's corporate servers located in Brooklyn Park, Minnesota.	MADALINA PURCARIN CRISTIAN STANACHE
13	12/28/2107	Wire from the Target store in Falls Church, Virginia (Store No. 1431), to	CRISTIAN STANACHE

CT	DATE	DESCRIPTION	DEFENDANT(S)
		Target's corporate servers located in Brooklyn Park, Minnesota.	
14	12/28/2017	Wire from the Target store in Falls Church, Virginia (Store No. 1893), to Target's corporate servers located in Brooklyn Park, Minnesota.	MADALINA PURCARIN CRISTIAN STANACHE
15	01/15/2018	Wire from the Target store in Falls Church, Virginia (Store No. 1893), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA BUSTEAN
16	01/15/2018	Wire from the Target store in Chantilly, Virginia (Store No. 1827), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA BUSTEAN
17	01/15/2018	Wire from the Target store in Manassas, Virginia (Store No. 2323), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA TANASACHE MARIA BUSTEAN
18	02/23/2018	Wire from the Target store in Falls Church, Virginia (Store No. 1893), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA BUSTEAN
19	02/23/2018	Wire from the Target store in Falls Church, Virginia (Store No. 1431), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA TANASACHE MARIA BUSTEAN
20	03/03/2018	Wire from the Target store in Richmond, Virginia (Store No. 2436), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA TANASACHE
21	03/03/2018	Wire from the Target store in Williamsburg, Virginia (Store No. 2296), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA TANASACHE
22	03/03/2018	Wire from the Target store in Newport News, Virginia (Store No. 1103), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA TANASACHE
23	03/04/2018	Wire from the Target store in Hampton, Virginia (Store No. 2501),	FRANCISCO STANACHE

CT	DATE	DESCRIPTION	DEFENDANT(S)
		to Target's corporate servers located in Brooklyn Park, Minnesota.	
24	03/04/2018	Wire from the Target store in Virginia Beach, Virginia (Store No. 2770), to Target's corporate servers located in Brooklyn Park, Minnesota.	MARIA TANASACHE FRANCISCO STANACHE
25	03/16/2018	Wire from the Target store in Falls Church, Virginia (Store No. 1431), to Target's corporate servers located in Brooklyn Park, Minnesota.	MADALINA PURCARIN
26	03/16/2018	Wire from the Target store in Gainesville, Virginia (Store No. 1873), to Target's corporate servers located in Brooklyn Park, Minnesota.	MADALINA PURCARIN
27	03/17/2018	Wire from the Target store in Alexandria, Virginia (Store No. 1533), to Target's corporate servers located in Brooklyn Park, Minnesota.	CRISTIAN STANACHE
28	03/17/2018	Wire from the Target store in Alexandria, Virginia (Store No. 1076), to Target's corporate servers located in Brooklyn Park, Minnesota.	MADALINA PURCARIN CRISTIAN STANACHE
29	03/24/2018	Wire from the Target store in Alexandria, Virginia (Store No. 1533), to Target's corporate servers located in Brooklyn Park, Minnesota.	MADALINA PURCARIN
30	03/24/2018	Wire from the Target store in Alexandria, Virginia (Store No. 1076), to Target's corporate servers located in Brooklyn Park, Minnesota.	CRISTIAN STANACHE MADALINA PURCARIN

(All in violation of Title 18, United States Code, Sections 1343 and 2.)

**FORFEITURE NOTICE**

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT THE PROPERTY DESCRIBED BELOW IS SUBJECT TO FOFEITURE:

1. Pursuant to Federal Rule of Criminal Procedure 32.2(a), Defendants FRANCISCO STANACHE, MARIA TANASACHE, MARIA BUSTEAN, CRISTIAN STANACHE, and MADALINA PURCARIN are hereby notified that, if convicted of an offense alleged in Counts 1 through 30 of this Indictment, the Defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), their interest in any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of the Counts of conviction. If property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute property, including but not limited to the following:

- a. A sum of money equal to at least \$122,248.03 in United States currency, representing the amount of proceeds obtained as a result of the offenses.


(In accordance with Title 18, United States Code, Section 981(a)(1)(C); Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

A TRUE BILL

Pursuant to the E-Government Act,,  
The original of this page has been filed  
~~under seal in the Clerk's Office~~  
FOREPERSON

G. Zachary Terwilliger  
United States Attorney

By:

  
Russell L. Carlberg  
Special Assistant United States Attorney LT  
Brett J. Talley  
Special Assistant United States Attorney